

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

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AMDOCS (ISRAEL) LIMITED, an Israeli : Case No. 1:10-CV-910 (LMB/TRJ)
Corporation, :
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Plaintiff, : **JURY TRIAL DEMANDED**
 :
v. :
 :
OPENET TELECOM, INC., a Delaware :
Corporation, and OPENET TELECOM LTD., an :
Irish Corporation, :
 :
Defendants. :
 :
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**PLAINTIFF AMDOCS (ISRAEL) LIMITED'S REPLY TO DEFENDANT OPENET
TELECOM, INC.'s COUNTERCLAIMS**

Plaintiff Amdocs (Israel) Limited ("Amdocs") hereby replies to the Counterclaims of
defendant Openet Telecom Inc. ("Openet") dated November 24, 2010.

32. To the extent any of paragraphs 1-24 of Openet's Answer are determined in
whole or in part to state counterclaims or the basis for counterclaims, Plaintiff Amdocs
incorporates by reference paragraphs 1-24 of its Complaint, and denies each and every
additional averment contrary to the averments in Plaintiff's Complaint contained in
paragraphs 1-24 of Openet's Answer. As affirmative defenses, paragraphs 25-31 of
Openet's Answer require no response. However, to the extent Openet purports to
incorporate by reference as counterclaims any of paragraphs 25-31 of Openet's Answer
and/or any of Openet's Defenses, those averments are denied, except to the extent admitted

in Plaintiff's responses below. To the extent Openet's allegations state legal conclusions, no response is required.

33. The allegations contained in paragraph 33 of the Counterclaims do not contain allegations of fact requiring an answer from Amdocs. To the extent an answer is deemed required, Amdocs admits that Openet's Counterclaims purport to arise under various sections of Title 28 and Title 35 of the U.S. Code, and that this Court would have jurisdiction for proper claims of the kind alleged. Except as expressly admitted, Amdocs denies each and every allegation of this paragraph of the Counterclaims.

34. The allegations contained in paragraph 34 of the Counterclaims do not contain allegations of fact requiring an answer from Amdocs. To the extent an answer is deemed required, Amdocs admits it filed a Complaint against Openet for patent infringement, and that this Court has personal jurisdiction over Amdocs for the purposes of Openet's Counterclaims Counts I – IV in this action. Except as expressly admitted, Amdocs denies each and every allegation of paragraph 34 of the Counterclaims.

35. The allegations contained in paragraph 35 of the Counterclaims do not contain allegations of fact requiring an answer from Amdocs. To the extent an answer is deemed required, Amdocs admits that it filed a Complaint against Openet for patent infringement, alleging that venue is proper in this district pursuant to 28 U.S.C. §§ 1391 and 1400(b), and that the Eastern District of Virginia is a proper venue for the purposes of this action. Except as expressly admitted, Amdocs denies each and every allegation of paragraph 35 of the Counterclaims.

36. In regard to paragraph 36 of the Counterclaims, Amdocs admits that, as alleged in its Complaint, Amdocs is the owner of U.S. Patent Nos. 6,836,797 (“the ’797 patent”) and 7,631,065 (“the ’065 patent”).

37. In regard to paragraph 37 of the Counterclaims, Amdocs admits that it alleges in its Complaint that Openet is directly infringing, inducing infringement of, and/or contributing to the infringement of the ’797 patent and the ’065 patent.

38. In regard to paragraph 38 of the Counterclaims, Amdocs admits that a controversy exists between Amdocs and Openet with respect to the infringement of the ’797 patent and the ’065 patent.

COUNTERCLAIM COUNT I
(Invalidity of U.S. Patent No. 6,836,797)

39. In regard to paragraph 39 of the Counterclaims, Amdocs restates and realleges the allegations of its Complaint and each of the foregoing paragraphs of its Reply to Defendant Openet Telecom, Inc.’s Counterclaims as if fully set forth herein.

40. Amdocs denies the allegations of paragraph 40 of the Counterclaims.

COUNTERCLAIM COUNT II
(Invalidity of U.S. Patent No. 7,631,065)

41. In regard to paragraph 41 of the Counterclaims, Amdocs restates and realleges the allegations of its Complaint and each of the foregoing paragraphs of its Reply to Defendant Openet Telecom, Inc.’s Counterclaims as if fully set forth herein.

42. Amdocs denies the allegations of paragraph 42 of the Counterclaims.

COUNTERCLAIM COUNT III
(Non-infringement of U.S. Patent No. 6,836,797)

43. In regard to paragraph 43 of the Counterclaims, Amdocs restates and realleges the allegations of its Complaint and each of the foregoing paragraphs of its Reply to Defendant Openet Telecom, Inc.'s Counterclaims as if fully set forth herein.

44. Amdocs denies the allegations of paragraph 44 of the Counterclaims.

COUNTERCLAIM COUNT IV
(Non-infringement of U.S. Patent No. 7,631,065)

45. In regard to paragraph 45 of the Counterclaims, Amdocs restates and realleges the allegations of its Complaint and each of the foregoing paragraphs of its Reply to Defendant Openet Telecom, Inc.'s Counterclaims as if fully set forth herein.

46. Amdocs denies the allegations of paragraph 46 of the Counterclaims.

Responding to Openet's Prayer for Relief, Plaintiff Amdocs denies that Openet is entitled to any relief whatsoever, whether as requested or otherwise.

WHEREFORE, Plaintiff Amdocs respectfully realleges the request in its Prayer for Relief in its Complaint, and requests judgment in its favor and against Openet on Counts I through IV of Openet's Counterclaims, including costs, fees, and whatever other relief the Court deems appropriate.

The Plaintiff respectfully requests a trial by jury on all issues properly triable by jury.

Respectfully submitted,

_____/s/_____
Gregory H. Lantier (Bar. No. 65657)
WILMER, CUTLER, PICKERING,
HALE AND DORR LLP
1875 Pennsylvania Avenue, N.W.
Washington, DC 20006
Phone: (202) 663-6000
Fax: (202) 663-6363
gregory.lantier@wilmerhale.com

Attorney for Plaintiff
Amdocs (Israel) Limited

Of counsel:

Nels T. Lippert
S. Calvin Walden
Laura A. Sheridan
WILMER, CUTLER, PICKERING,
HALE AND DORR LLP
399 Park Avenue
New York, New York 10022
Phone: (212) 230-8800
Fax: (212) 230-8888

Attorneys for Plaintiff

Dated: December 15, 2010

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of December, 2010, I will electronically file the foregoing with the Clerk of Court using CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Brian Himanshu Pandya, Esq.
(Attorney for Openet Telecom, Inc. and Openet Telecom, Ltd.)
Wiley Rein LLP
1776 K Street NW
Washington, DC 20006
bpandya@wileyrein.com

_____/s/____

Gregory H. Lantier (Bar. No. 65657)
WILMER, CUTLER, PICKERING,
HALE AND DORR LLP
1875 Pennsylvania Avenue, N.W.
Washington, DC 20006
Phone: (202) 663-6000
Fax: (202) 663-6363
gregory.lantier@wilmerhale.com

Attorney for Plaintiff
Amdocs (Israel) Limited